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14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17 UNITED STATES OF AMERICA,) NO CR19-0367 CRB
18 Plaintiff,)
v.) STATEMENT OF THE UNITED STATES IN
EDUARDO VIERA-CHIRINOS, et al) RESPONSE TO JANUARY 15, 2020 COURT
a/k/a "Rojo") ORDER
Defendants.)

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21 During the January 15, 2020 status conference in the above-captioned case, the Court ordered the
22 government to file a statement for each defendant outlining the following information: "quantity of
23 drugs, potential mandatory minimum, criminal history category, deportation status, and how long the
24 defendant has been in federal custody." Dkt. 148, Minute Entry. In response to the Court's order, the

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STMT OF USA
NO CR 19-0367 CRB

1 United States submits the chart attached here.

2 DATED: January 27, 2020

Respectfully submitted,

3 DAVID L. ANDERSON

4 United States Attorney

5 /s

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DEFENDANT	MINIMUM DRUG QUANTITY ATTRIBUTABLE TO DEFENDANT ¹	SUBJECT TO MANDATORY MINIMUM	CRIMINAL HISTORY CATEGORY ²	IMMIGRATION STATUS	SUBJECT TO REMOVAL PROCEEDINGS	CUSTODY AND LITIGATION STATUS
EDUARDO ALFONSO VIERA-CHIRINOS, a/k/a "Rojo"	Methamphetamine (mixture / substance) -1173.7 g Heroin - 2119.4 g Cocaine Base - 467 g Cocaine - 2155 g Total – 6565.46 kg CDW ³	Yes – 120 months	I	Undocumented	Yes	In custody since 7/29/2019 Status hearing on 3/25/2020
VICTOR MANUEL ALFONSO VIERA-CHIRINOS, a/k/a "Mojarra"	Heroin - 1400.8 g Cocaine - 1986.1 g Total – 1798.02 kg CDW	Yes – 60 months (drug quantity supports 120-month mandatory minimum)	I	Undocumented	Yes	In custody since 7/29/2019 Status hearing on 3/25/2020
JORGE ALBERTO VIERA-CHIRINOS, a/k/a "Chino"	Heroin - 1400.8 g Cocaine - 1986.1 g Total – 1798.02 kg CDW	Yes – 60 months (drug quantity supports 120-month mandatory minimum)	I	Undocumented	Yes	In custody since 8/16/2019 Status hearing on 3/25/2020
JORGE ENRIQUE VIERA-CHIRINOS, a/k/a "Enrique"	Heroin - 1400.8 g Cocaine - 1986.1 g Total – 1798.02 kg CDW	Yes – 60 months (drug quantity supports 120-month mandatory minimum)	I	Undocumented	Yes	In custody since 7/29/2019 Status hearing on 3/25/2020

¹ The reported drug quantities are based on the government's current estimates. Additional chemical testing and analysis of intercepted communications are ongoing and these calculations may change depending on those assessments.

² The reported criminal history categories are estimates based on criminal history reports in the government's possession that have been produced to individual defendants. The criminal history categories have not been verified by U.S. Pretrial Services or the U.S. Probation Office.

³ CDW refers to "Converted Drug Weight" as determined under U.S. Sentencing Guidelines § 2D1.1(c), Notes to Drug Quantity Table (K), and Application Note 8.

DEFENDANT	MINIMUM DRUG QUANTITY ATTRIBUTABLE TO DEFENDANT ¹	SUBJECT TO MANDATORY MINIMUM	CRIMINAL HISTORY CATEGORY ²	IMMIGRATION STATUS	SUBJECT TO REMOVAL PROCEEDINGS	CUSTODY AND LITIGATION STATUS
KAREN CASTRO-TORRES	Methamphetamine (mixture / substance) - 1173.7 g Heroin - 2119.4 g Cocaine Base - 467 g Cocaine - 2155 g Total - 6565.46 kg CDW	Yes – 60 months (drug quantity supports 120-month mandatory minimum)	I	Undocumented	Yes	In custody since 7/29/2019 Status hearing on 3/25/2020
CILDER RAMON GAMEZ-VELASQUEZ	Methamphetamine (mixture / substance) - 73.5 g Heroin – 1474.3 g Cocaine Base - 199.5 g Cocaine – 2035.1 g Total – 2740.74 kg CDW	Yes – 60 months (drug quantity supports 120-month mandatory minimum)	I	Undocumented	Yes	In custody since 7/29/2019 Status hearing on 3/25/2020
ALEXANDER GONZALEZ-VASQUEZ, a/k/a “Ale”	Heroin - 1400.8 g Cocaine - 1986.1 g Total – 1798.02 kg CDW	Yes – 120 months	I	Undocumented	Yes	In custody since 7/29/2019 Status hearing on 3/25/2020
GUSTAVO ADOLFO GAMEZ-VELASQUEZ, a/k/a “Bomba”	Methamphetamine (mixture / substance) - 59.5 g Cocaine base - 75.25 g Total – 387.72 kg CDW	Yes – 60 months	I	Undocumented	Yes	In custody since 7/31/2019 Change of plea scheduled for 2/12/2020

DEFENDANT	MINIMUM DRUG QUANTITY ATTRIBUTABLE TO DEFENDANT ¹	SUBJECT TO MANDATORY MINIMUM	CRIMINAL HISTORY CATEGORY ²	IMMIGRATION STATUS	SUBJECT TO REMOVAL PROCEEDINGS	CUSTODY AND LITIGATION STATUS
ELVIN MEJIA-PADILLA, a/k/a "Pajaro"	Methamphetamine (mixture / substance) - 66.5 g Heroin – 3.5 g Cocaine Base - 103.25 g Cocaine – 47.25 g Total – 514.66 kg CDW	Yes – 60 months	I	Undocumented	Yes	In custody since 8/14/2019 Change of plea scheduled for 2/12/2020
YORDI YABIER AGURCIA GALINDO	Methamphetamine (mixture / substance) - 3.5 g Heroin – 7 g Cocaine Base - 7 g Cocaine – 1.75 g Total – 39.35 kg CDW	Yes – 60 months	I	Undocumented	Yes	In custody since 8/9/2019 Change of plea scheduled for 2/12/2020
RUDIS VALLADERES-CACERES	Methamphetamine (mixture / substance) – 38.5 g Heroin – 63 g Cocaine Base - 14 g Total – 190 kg CDW	Yes – 60 months	I	Undocumented	Yes	In custody since 8/9/2019 Change of plea scheduled for 2/12/2020